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18     Attorneys for Defendant SUNGAGE FINANCIAL, LLC

19     CAMERON BEATTY, individually  
20     and on behalf of all others similarly  
21     situated,

22       Plaintiff,

23       v.

24     SUNGAGE FINANCIAL, LLC, a  
25     Massachusetts limited liability  
26     company; NBT BANK, N.A., a New  
27     York Corporation; SUNMADE  
28     ENERGY, LLC, a California limited  
   liability company; and DOES 1  
   through 50, inclusive,

29       Defendants.

30     Case No. 1:25-cv-00645-KES-SKO

31     **STIPULATION AND ORDER FOR  
32     DEFENDANT SUNGAGE  
33     FINANCIAL, LLC TO CONTINUE  
34     RESPONSE DEADLINE TO the  
35     AMENDED COMPLAINT**

36     **(Doc. 33)**

37     Filing Date:            May 30, 2025  
38     Trial Date:            None set

1 Plaintiff Cameron Beatty and Defendant Sungage Financial, LLC (“Sungage”  
2 or “Defendant Sungage”), by and through their counsel, hereby make the following  
3 stipulations regarding the deadline for Defendant Sungage to respond to Plaintiff’s  
4 Amended Complaint.

5 1. WHEREAS, on August 18, 2025, the Parties filed a Joint Stipulation  
6 and Proposed Order that included language stating that Plaintiff shall have until  
7 September 30, 2025 to file an amended complaint (Dkt. No. 24);

8 2. WHEREAS the Joint Stipulation and Proposed Order filed on August 18,  
9 2025 also included language that Defendants deadline to respond to the amended  
10 complaint would be October 30, 2025 (Dkt. No. 24);

11 3. WHEREAS on August 18, 2025, the Court entered an Order granting that  
12 stipulation (Dkt. No.25);

13 4. WHEREAS Plaintiff did not file his amended complaint until October 22,  
14 2025 (Dkt. No. 27);

15 5. WHEREAS the Parties previously agreed that Defendants’ new deadline to  
16 respond to the amended complaint should be December 5, 2025, and the Court entered  
17 an Order granting that stipulation (Dkts. 30-31);

18 6. WHEREAS, the parties want to pursue additional meet and confer efforts  
19 before Sungage files its response, and given the holiday season, the parties agree to  
20 extend Sungage’s response deadline to January 9, 2026;

21 7. THEREFORE, subject to the Court’s approval, the Parties HEREBY  
22 STIPULATE and agree that Defendant Sungage’s deadline to respond to the amended  
23 complaint is January 9, 2026.

24 Dated: December 4, 2025

**LAW OFFICES OF JASON M. INGBER**

25  
26  
27 By: /s/ Jason M. Ingber (with email authorization)  
28 Jason M. Ingber  
Serach B. Shafa

1 Attorneys for Plaintiff  
2 Cameron Beatty

3 Dated: December 4, 2025

4 **WIECHERT, MUNK & GOLDSTEIN, PC**

5 By: /s/Jessica Munk  
6 Jessica C. Munk  
7 David W. Wiechert  
8 Attorneys for Defendant  
9 Sungage Financial, LLC

10 Dated: December 4, 2025

11 **MURPHY & KING**

12 By: /s/ Dan Rabinovitz (with email authorization)  
13 Daniel J. Goodrich, PHV  
14 Daniel M. Rabinovitz, PHV  
15 Attorneys for Defendant  
16 Sungage Financial, LLC

## ORDER

Based on the Parties' foregoing Stipulation (Doc. 33), and good cause appearing Fed. R. Civ. P. 16(b)(4)), the Court hereby ORDERS that Defendant Sungage Financial, LLC's deadline to respond to the amended complaint is continued to **January 9, 2026**.

IT IS SO ORDERED.

Dated: **December 5, 2025**

*/s/ Sheila K. Oberto*

UNITED STATES MAGISTRATE JUDGE